Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address	FOR COURT USE ONLY						
WEILAND GOLDEN GOODRICH LLP							
Jeffrey I. Golden, State Bar No. 133040							
jgolden@wgllp.com							
Reem J. Bello, State Bar No. 198840							
rbello@wgllp.com 650 Town Center Drive, Suite 600							
Costa Mesa, California 92626							
Telephone 714-966-1000							
Facsimile 714-966-1002							
☐ Individual appearing without attorney ☐ Attorney for: Chapter 7 Trustee Weneta M.A. Kosmala							
	ANKRUPTCY COURT						
CENTRAL DISTRICT OF CALIFORNIA							
In re:	CASE NO.: 8:19-bk-12293-CB						
WESTERN PAD, Inc., a California corporation,	CHAPTER: 7						
	NOTICE OF SALE OF ESTATE PROPERTY						
Debtor(s).							
<b>Sale Date</b> : 10/08/2019	<b>Time:</b> 2:30 pm						
Location: United States Bankruptcy Court, Courtroom 5D,	<u> </u>						
Type of Sale: ⊠ Public ☐ Private Last date t	o file objections: 09/24/2019						
Description of property to be sold: See notice attached hereto.							
Terms and conditions of sale: Subject to overbid. Sale is	"as is" "where is," with no warranties or guaranties of any						
	erms and conditions apply; see the attached notice of hearing						
on the motion. The motion is on file with the Clerk of Court	•						
Proposad sala prica:							
Proposed sale price:							

Overbid procedure (if any): See Exhibit "1" attached for overbid deposit. Overbid increments are \$2,000.

If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:

Sale Date: October 8, 2019 at 2:30 p.m. Location United States Bankruptcy Court Central District of California, Santa Ana Division 411 W. 4th Street, Courtroom 5D Santa Ana, CA 92701

## Contact person for potential bidders (include name, address, telephone, fax and/or email address):

Reem J. Bello Weiland Golden Goodrich LLP 650 Town Center Drive, Suite 600 Costa Mesa, CA 92626

Phone: (714) 966-1000 Fax: (714) 966-1002 Email: rbello@wgllp.com

Date: 09/17/2019

ESTATE OF WESTERN PAD, INC. CASE NO. SA-8:19-12293-CB

#### **OFFERS TO PURCHASE ASSETS OF THE ESTATE**

BUYER	<u> </u>	ASSET DESCRIPTION	BID/OFFER	OFFER RELATED ISSUES
GREAT WESTERN INC. 2100 NW 22ND AVE.	1	1 KODAK TST TRENDSETTER, PLATESETTER/PLATE IMAGER		AGREES TO WAIVE THEIR PREPETITION CLAIM WHICH PER SCHEDULES IS \$10,437.26
PORTLAND, OR 97210				COST OF STORAGE - 6,250 (INCLUDES STORAGE THRU SEPT. 30)
				OVERBID AMOUNT \$30,000
DRUMLINE DRUMMOND PRINTING INC.		KANSA SERIES 3 KPZ83 PADDERS, MODEL SERIES 3 KPZ83, SN #474 & #492 W/ GLUE AND SPARE PARTS HYDRAULIC PALLET JACKS	8,500.00	COST OF STORAGE - 15,780.00
2114 S. MAIN STREET STUTTGARD, AR 72160	2	(2005) EVERGARD AUTOMATION ROBOTIC CALENDAR LEATHER CORNER APPLCATOR W/ADEPT COBRA 600 ROBOTC ARM SN #560-2042-0-41-6E; ALL CORNER MATERIAL LEFT OVER & PARTS W/IT, BOX OF GLUE STUEBING 30 INCH TINTING MACHINES W/ SLIDES PADDY WAGONS (CURRENTLY 7 IN COUNT) THEISEN & BONITE SPRINT 16-POCKET COLLATOR		OVERBID AMOUNT \$30,000
MATTRIX TOWING 1222 E. ASH ST. FULLERTON, CA 92831	2	HYSTER FORKLIFTS, (1) S40MX, 4000 LB CAPACITY; (1) S50 XM, 5000 LB CAPACITY, W/ 3 ADDITIONAL PROPANE TANKS CROWN HYDAULIC LIFTS/PALLET JACKS 2008 FORD F250, GOLD, 54,000 MILES; VIN- 1FTSX20588EC48765 2008 TOYOTA HIGHLANDER, BLACK, 170,000 MILES; VIN# JTEES42A882098221	13,000.00	AGREES TO WAIVE TOWING AND STORAGE FEES TOTALING APPROX \$950 NOW AND ADDITIONAL STORAGE FEES OF \$450 FOR SEPTEMBER STORAGE COST OF STORAGE - \$1,400 - (INCLUDES STORAGE THRU SEPT 30)
				OVERBID AMOUNT \$20,000
		TOTAL	41 500 00	

TOTAL

41,500.00

1 2 3 4 5	WEILAND GOLDEN GOODRICH LLP Jeffrey I. Golden, State Bar No. 133040 jgolden@wgllp.com Reem J. Bello, State Bar No. 198840 rbello@wgllp.com 650 Town Center Drive, Suite 600 Costa Mesa, California 92626 Telephone 714-966-1000 Facsimile 714-966-1002									
6 7	Attorneys for Chapter 7 Trustee Weneta M.A. Kosmala									
8	UNITED STATES BANKRUPTCY COURT									
9	CENTRAL DISTRICT OF CALIFORNIA									
10										
11	In re	Case No. 8:19-bk-12293-CB								
12	WESTERN PAD, INC., a California corporation,	Chapter 7								
13	Debtor.	NOTICE OF HEARING ON CHAPTER 7 TRUSTEE'S MOTION (1) AUTHORIZING SALE OF PERSONAL PROPERTY ASSETS FREE AND CLEAR OF LIENS								
14										
15		AND INTERESTS PURSUANT TO 11 U.S.C. §§ 363(b) AND (F); APPROVING								
16		OVERBID PROCEDURES; AND (3) APPROVING BUYER AS GOOD FAITH								
17		PURCHASER PURSUANT TO 11 U.S.C. § 363(m)								
18										
19		DATE: October 8, 2019 TIME: 2:30 P.M.								
20		CTRM: 5D								
21										
22 23	TO THE OFFICE OF THE UNITED STATES TRUSTEE AND ALL PARTIES IN									
24		ober 8, 2019 at 2:30 p.m. in the United States								
25										
26	on the Chapter 7 Trustee's Motion (1) Authorizing Sale Of Personal Property Assets Free									

And Clear Of Liens And Interests Pursuant To 11 U.S.C. §§ 363(B) And (F); Approving Overbid Procedures; And (3) Approving Buyer As Good Faith Purchaser Pursuant To 11 27

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**NOTICE** 

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*U.S.C.* § 363(M) (the "Motion")<sup>1</sup> filed by Weneta M.A. Kosmala, the chapter 7 trustee (the "Trustee") for the bankruptcy estate (the "Estate") of Western Pad, LLC (the "Debtor"),

### **BACKGROUND**

By the Motion, the Trustee seeks Bankruptcy Court approval of a sale of equipment (the "Equipment") owned by the Debtor subject to overbid. As discussed below, the Trustee believes the proposed sale is reasonable, in the best interest of the Estate, and supported by a valid business purpose. The offers received to buy the equipment are the best offers received by the Trustee to date. The proposed sale will bring cash into the Estate for the benefit of creditors and is subject to overbid. Accordingly, the Trustee respectfully requests that this Court enter an order granting this Motion, authorizing the sale of the equipment, and approving overbid procedures so that the Equipment is sold for the highest and best offer

## A. General Background

On June 14, 2019 (the "Petition Date"), Debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code (the "Case") and Weneta M.A. Kosmala was appointed Chapter 7 trustee. Debtor's 341(a) meeting of creditors has been continued and currently is set for October 3, 2019.

In its bankruptcy schedules, Debtor listed \$139,134.86 in personal property assets, which include a rent deposit, shop and office equipment, vehicles, machinery and other equipment. Debtor scheduled \$203,661.92 in secured claims and \$821,518.08 in nonpriority unsecured claims.

# B. The Personal Property Assets

According to Debtor's schedules, the Estate owns, among other things, interests in Equipment that were used in the Debtor's business operations as a commercial printer. Since her appointment, the Trustee has worked diligently to obtain bids for the sale of Equipment and has obtained three separate offers. A true and correct copy of the listing of offers to the corresponding Equipment is attached to the Motion as Exhibit "1."

# C. Liens, Claims and Interests on the Equipment

According to a search of public records, the Equipment is encumbered as follows:

Recording	Lien Holder	Type of	Document	Lien
Date		Encumbrance	Number	Amount
9/23/2009	State Financial Corporation	Financing Statement	09-7208906980	\$1,078.90

The Trustee proposes to pay the lien of State Financial Corporation in full from the proceeds of the sale.

<sup>&</sup>lt;sup>1</sup> All terms not specifically defined herein shall have the meanings set forth in the Motion.

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### III. TERMS OF THE PROPOSED SALE

Trustee proposes to sell certain assets to Great Western, Inc., Drumline and Mattrix Towing, the proposed buyers ("Buyers"). The asset description, offer and other related issues to each offer are set forth in Exhibit "1" to the Motion.

The salient terms of the proposed sale to each (the "Sale") are as follows:

- 1. Bankruptcy Court Approval. The Sale to each Buyer is subject to approval of the Court. The order approving the Sale shall become final fifteen days after it is entered unless an appeal is timely-filed and a stay pending appeal is obtained (the "Final Order").
  - Payment of Purchase Price.
- a. Great Western Inc. shall pay the purchase price of \$20,000 and agrees to waive its pre-petition claim which pursuant to the Debtor's schedules is \$10,437.26.
  - b. Drumline shall pay the purchase price of \$8,500.
- c. Mattrix Towing shall pay the purchase price of \$13,000 and agrees to waive the towing and storage fees which total approximately \$1,400.
- 3. Subject to Overbids. The purchase of the Estate's interest in the Equipment listed on Exhibit "1" to the Motion shall be subject to overbid. In order to minimize administrative costs to the Estate, each Buyer has taken possession of the Equipment, which is being stored subject to the Final Order. The Trustee shall propose overbid procedures wherein all overbids shall pay the Purchase Price, plus the costs that each Buyer has incurred in taking possession of the Equipment. The amounts for overbid are delineated on Exhibit "1."
- 4. No Representations or Warranties. The Equipment being sold to the Purchaser on an as-is, where-is basis, without any representations or warranties or any kind, expressed or implied, by the Trustee.

#### IV. PROPOSED OVERBID PROCEDURES

#### A. Overbid Procedures

The Trustee proposes the following procedure to allow for overbids prior to the Court's approval of the sale of the Westchester Interest to ensure that the Westchester Interest is sold for the best possible price:

- 1. Qualifying bidders ("Qualifying Bidder") shall:
- a. Bid at least the Purchase Price referenced above, plus the costs incurred by each Buyer;
- b. Set forth in writing the terms and conditions of the offer that are at least as favorable to the Trustee as those set forth in the Agreement;
- c. Be financially qualified, in the Trustee's exercise of his sound business judgment, to close the purchase of the Westchester Interest;
- d. Submit an offer that does not contain any contingencies to closing the sale, including, but not limited to, financing contingencies;
- e. Submit the full payment (the "Overbid Payment") payable to Weneta M.A. Kosmala for the Bankruptcy Estate of Western Pad, Inc, in the form of a cashier's check, which Overbid Deposit shall be non-refundable if the bid is deemed to be the Successful Bid, as defined in paragraph 4 below. The Overbid Deposit, written offer, and evidence of financial qualification must be delivered to the Trustee's counsel at or before the hearing

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currently set for October 8, 2019 at 2:30 p.m. The Trustee's counsel's address is listed in the upper left-hand corner of page 1 of this Motion.

- 2. At the hearing on the Motion, only the Buyers or their representatives and any party who is deemed a Qualifying Bidder shall be entitled to bid.
- 3. Any incremental bid in the bidding process shall be at least \$2,000.00 higher than the prior bid.
- 4. At the hearing on the Motion and upon conclusion of the bidding process, the Trustee shall decide, subject to Court approval, which of the bids is the best bid, and such bid shall be deemed to be the "Successful Bid." The bidder who is accepted by the Trustee as the successful bidder (the "Successful Bidder") must pay all amounts reflected in the Successful Bid in cash at the closing of the sale. At the hearing on the Motion, and upon conclusion of the bidding process, the Trustee may also acknowledge a back-up bidder (the "Back-Up Bidder") which shall be the bidder with the next best bid. Should the Successful Bidder fail to close the sale, the Trustee may sell to the Back-Up Bidder without further Court order.
- 5. Overbids shall be all cash and no credit shall be given to the purchaser or over bidder(s).

# **SUMMARY OF RELIEF REQUESTED**

By the Motion, the Trustee seeks entry of an order providing for the following relief:

- 1. Granting this Motion;
- 2. Approving the overbid procedures outlined in the Motion;
- 3. Authorizing the Trustee to sell the Equipment to each Buyer or to the Successful Bidder as is, where is, without representations or warranties, pursuant to 11 U.S.C. § 363(b) and (f), free and clear of the lien of State Financial Corporation and authorizing the Trustee to pay the lien from the proceeds of sale;
- 4. Determining that the Buyer, Successful Bidder, or the Back-Up Bidder are "good faith purchasers" pursuant to 11 U.S.C. § 363(m);
- 5. Authorizing the Trustee to take any and all necessary action to consummate the sale of the Equipment;
- 6. Authorizing the return of any Overbid Deposit without further court order to those whose bids are not deemed to be the Successful Bid;
- 7. To the extent there is any tax liability to the Estate from the Sale, the Trustee is authorized to pay such taxes from the net proceeds of the Sale;
- 8. Waiving any requirements for lodging periods imposed by Local Bankruptcy Rule 9021-1 and any other applicable bankruptcy rules;
- 9. Waiving the stay imposed by Federal Rule of Bankruptcy Procedure 6004(h) and any other applicable bankruptcy rules; and
  - 10. For such other and further relief as the Court may deem just and proper.

The Motion is on file with the Bankruptcy Court and is based upon the Memorandum of Points and Authorities, the Declaration of Weneta M.A. Kosmala and the Exhibits attached to the Motion, all pleadings, papers and records on file with the Court, and on such other evidence, oral or documentary, as may be presented to the Court at the time of the hearing on the Motion.

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Your Rights May Be Affected. You should read these papers carefully and 1 discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.) 3 **Deadline for Opposition Papers.** The Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose the Motion, you must file a written response with the Court and serve a copy of it upon the Movant or Movant's attorney at the address set forth above no less than 14 days prior to the above hearing date. If you fail to file a written response to the Motion within such time period, the Court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief. 6 7 Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure. The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures. 9 PLEASE TAKE FURTHER NOTICE that any party requesting a copy of the Motion or any supporting documents filed with the Court with respect to the Motion may contact counsel for the Trustee, Reem J. Bello, Weiland Golden Goodrich LLP by email at 10 rbello@wgllp.com, by mail at 650 Town Center Drive, Suite 600, Costa Mesa, California 11 92626, or by telephone at (714) 966-1000. 12 13 Dated: September 17, 2019, WEILAND GOLDEN GOODRICH LLP 14 /s/ Reem J. Bello By: 15 REEM J. BELLO Proposed Counsel for Chapter 7 16 Trustee, Weneta M.A. Kosmala 17 18 19 20 21 22 23 24 25 26 27 28 1234521.1 NOTICE 5

### PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 600, Costa Mesa, California 92626

A true and correct copy of the foregoing document entitled (specify): NOTICE OF HEARING ON CHAPTER 7 TRUSTEE'S MOTION TO FOR ORDER (1) AUTHORIZING SALE OF PERSONAL PROPERTY ASSETS FREE AND CLEAR OF LIENS AND INTERESTS PURSUANT TO 11 U.S.C. §§ 363(b) AND (f); (2) APPROVING OVERBID

PROCEDURES; AND (3) APPROVING BUYER AS GOOD FAITH PURCHASER PURSUANT TO 11 U.S.C. § 363(m); will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below: 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) September 17, 2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below: X Service information continued on attached page 2. SERVED BY UNITED STATES MAIL: On (date) September 17, 2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed. X Service information continued on attached page 3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) September 17, 2019, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed. VIA PERSONAL DELIVERY: The Honorable Catherine Bauer, 411 W. 4th Street, 5th Floor, Santa Ana, CA 92701 Service information continued on attached page I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. September 17, 2019 Kelly Adele

Printed Name

Signature

Date

#### SERVICE LIST

Western Pad, a California corporation 391 Thor Place Brea, CA 92821-4133

**Debtor** 

Advertising Specialty Institute PO Box 15017 Wilmington, DE 19886-5017

Air Now Supply, Inc. 5362 Bolsa Avenue, Suite D Huntington Beach, CA 92649

All-Pack Co., Inc. 718 Arrow Grand Circle Covina, CA 91722

Avaya Financial Services/ CIT 1021 Centurion Pkwy, N., Suite 100 Jacksonville, FL 32256

Bank of America PO Box 15796 Wilmington, DE 19886-5796

Bank of America PO Box 982238 El Paso, TX 79998-2238

Bank of America P.O. Box 15019 Wilmington, DE 19886

Brea Metro, LLC 227 20th Street, Suite 100 Newport Beach, CA 92663-4343

Brea Metro, LLC Attn: Michael M. Wintringer, Esq. Solomon Grindle Lidstad & Wintringer, APC 11682 El Camino Real, Suite 250 San Diego, CA 92130 Burch/ Fusion P.O. Box 1301 Emporia, KS 66801

Burch/Fusion P.O. Box 51341 Los Angeles, CA 90051

Capital One PO Box 60599 City of Industry, CA 91716-0599

Capital One Bank (USA), N.A. By American Infosource as agent P.O. Box 71083 Charlotte, NC 82872

Case Paper Co., Inc. 199 E. Tioga Street Philadelphia, PA 19134

Chase Card PO Box 15298 Wilmington, DE 19850-5298

Chase Paper Company 9168 Hermosa Avenue Rancho Cucamonga, CA 91730-5307

CIT Communications Finance Corporation P.O. Box 593007 San Antonio, TX 78259

Citicard PO Box 6004 Sioux Falls, SD 57117-6004

Citibank 4541 P.O. Box 6000 Sioux Falls, SD 57117 Citi of Brea 1 Civic Center Circle Brea, CA 92821

Compare Business Systems, Inc. 4214 E. La Palma Avenue Anaheim, CA 92807

David Shermet 9525 Normandy Way Cypress, CA 90630-3503

Daylight Transport, LLC P.O. Box 93155 Long Beach, CA 90809

Doug Buckley, dba QR Weeklys 1215 Longport Way Corona, CA 92881-0982

Employment Development Department Bankruptcy Group MIC 92E P.O. Box 826880 Sacramento, CA 94280

Eastman Kodak Co. 1778 Solutions Center Chicago, IL 60677-1007

Eastman Kodak Company 343 State Street Credit Department Rochester, NY 14650

Explorer Pressroom Solutions 9441 Santa Fe Springs Road Santa Fe Springs, CA 90670

Franchise Tax Board Bankruptcy Section, MS: A-340 P.O. box 2952 Sacramento, CA 95812

Frederico Cruz Morales 362 W. Virginia Avenue Glendora, CA 91741 Gans Ink & Supply Co. 1441 Boyd Street P.O. Box 33806 Los Angeles, CA 90033

Grainger Industrial & Commercial Co. Grainger Industrial Dept. 835033713 4700 Hamner Avenue Mira Loma, CA 91752

Graphite Roller Co. Inc. 740 E. Route 66 Glendora, CA 91740

Great Western Ink 2100 NW 22nd Avenue Portland, OR 97210

Heidelberg USA Inc. 1000 Gutenberg Drive Kennesaw, GA 30144

Heidelberg USA, Inc. P.O. Box 5160 Carol Stream, IL 60197

Highway Express Trucking P.O. box 4491 Riverside, CA 92514

Home Depot CRC P.O. Box 9001031 Louisville, KY 40290

Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101

Ken H. Landsberg Co. 1900 W. University Drive, Suite 101 Tempe, AZ 85281

Liberty Mutual Insurance P.O. box 91013 Chicago, II 60680 Lighthouse Fire Protection P.O. Box 881 Huntington Beach, CA 92648

LoanMe, Inc. 1900 S. State College Boulevard, Suite 300 Anaheim, CA 92806

Margaret Simons, dba Will's Truck 9245 Signature Street Riverside, CA 92509

Metro Community Realty Corporation 500 Newport Center Drive, Suite 930 Newport Beach, CA

Orange County Tax Collector P.O. box 1438 Santa Ana, CA 92702

PIASC P.O. Box 910936 Los Angeles, CA 90091

Pacific Quality Packaging Corp 660 Neptune Avenue Brea, CA 92821

Pacific Coast Propane, Inc. P.O. Box 0427 Rialto, CA 92377

Pitney Bowes Global Financial Services 2225 American Drive Neenah, WI 54956

Pitney Bowes Inc. 27 Waterview Drive, 3<sup>rd</sup> Floor Shelton, CT 06484

Prime Converting Corp. PO Box 3207 Rancho Cucamonga, CA 91729-3207 Prudential Overall Supply 16901 Aston Avenue Irvine, CA 92606

Ptman/Agfa Corporation P.O. Box 2123 Carol Stream, IL 60132

Pure Green Corp 5455 Wilshire Boulevard, Suite 1410 Los Angeles, CA 90036

Related Products 707 Thomas Drive Bensenville, IL 60106

Republic Services 1131 N. Blue Gum Street Anaheim, CA 92806

Retail Capital, LLC dba, Credibly 1550 Kirts Blvd., Suite 100 Troy, MI 48084-4855

SAIA Motor Freight Line, LLC 11465 Johns Creek Prkwy, Suite 400 Duluth, GA 30097

SafetyNet, Inc. PMB 460 231 E. Allessandro Boulevard, Suite A Riverside, CA 92508

Senior Paper Company PO Box 325 Placentia, CA 92871-0325

Southcoast AQMD P.O. Box 4943 Diamond Bar, CA 91765

Southern California Gas. Co. P.O. Box C Monterey Park, CA 91756 Southern California Edison 1551 W. San Bernardino Road Covina, CA 91722

Southern California Edison P.O. Box 600 Rosemead, CA 91771

Spicers Paper, Inc. 12310 Slauson Avenue Santa Fe Springs, CA 90670

Staples
Dept 51-7811106953
P.O. Box 78004
Phoenix, AZ 85062

State Board of Equalization P.O. Box 942879 Sacramento, CA 94279

State Financial Corporation Hemar Rousso & Heald LLP c/o J. Alexandra Rhim 15910 Ventura Boulevard, 12<sup>th</sup> Floor Encino, CA 91436

State Financial Corp. 11661 San Vicente Boulevard, Suite 711 Los Angeles, CA 90049

Susquehanna Salt Lake, LLC 136 E. Temple, Suite 14 Salt Lake City, UT 84111

Tape Services, LTD 6939 Schaefer Avenue, D-189 Chino, CA 91710

Uline, Inc. P.O. Box 88741 Chicago, IL 60680 Venoos Graphic System 14252 Culver Drive, Suite A-534 Irvine, CA 92604

Verizon Wireless P.O. Box 660108 Dallas, TX 75266

Waste Management Eviroserv P.O. Box 43550 Phoenix, AZ 85080

Wells Fargo WF Business Direct P.O. Box 348750 Sacramento, CA 95834

Wells Fargo Bank, N.A. Small Business Lending Division P.O. Box 29482 Phoenix, AZ 85038

Wells Fargo Vendor Fin Serv. P.O. Box 3072 Cedar Rapids, IA 52406

Wells Fargo Vendor Financial Services, LLC Attn: Michelle Schulten 1010 Thomas Edison Boulevard SW Cedar Rapids, IA 52404

Wells Fargo Card PO Box 29482 Phoenix, AZ 85038-9482

Wiegel, Szekel & Frisby 500 N. State College Boulevard, Suite 1110 Orange, CA 92868

Willian Guerra 5391 Crestview Drive La Verne, CA 91750-1721 Yolanda J. Cruz 362 W. Virgina Avenue Glendora, CA 91741 Robert Uriarte Law Offices of Robert Uriarte 161 Commerce Way Walnut, CA 91789

Xerox Corp. PO Box 660501 Dallas, TX 75266-0501

## **Electronic Mail Notice List**

Reem J Bello rbello@wgllp.com, kadele@wgllp.com;vrosales@wgllp.com;cyoshonis@wgllp.com;cbmeeker@gmail.com Weneta M Kosmala (TR) ecf.alert+Kosmala@titlexi.com, wkosmala@txitrustee.com;dmf@txitrustee.com;kgeorge@kosmalalaw.com J. Alexandra Rhim arhim@hrhlaw.com United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov Robert G Uriarte rgulawoffice@gmail.com Michael M Wintringer mike@sglwlaw.com, andrea@sglwlaw.com

### PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 600, Costa Mesa, California 92626

A true and correct copy of the foregoing document entitled (specify): NOTICE OF SALE OF ESTATE PROPERTY will be

served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below: 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) September 17, 2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below: X Service information continued on attached page 2. SERVED BY UNITED STATES MAIL: On (date) September 17, 2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed. X Service information continued on attached page 3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) September 17, 2019. I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed. VIA PERSONAL DELIVERY: The Honorable Catherine Bauer, 411 W. 4th Street, 5th Floor, Santa Ana, CA 92701 Service information continued on attached page I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. September 17, 2019 Kelly Adele Date Printed Name Signature

## VIA U.S. MAIL

Western Pad, a California Corporation 391 Thor Place Brea, CA 92821 **Debtor** 

#### **Electronic Mail Notice List**

Reem J Bello rbello@wgllp.com, kadele@wgllp.com;vrosales@wgllp.com;cyoshonis@wgllp.com;cbmeeker@gmail.com Weneta M Kosmala (TR) ecf.alert+Kosmala@titlexi.com, wkosmala@txitrustee.com;dmf@txitrustee.com;kgeorge@kosmalalaw.com J. Alexandra Rhim arhim@hrhlaw.com United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov Robert G Uriarte rgulawoffice@gmail.com Michael M Wintringer mike@sglwlaw.com, andrea@sglwlaw.com